

**NON-HAZARDOUS AND UNIVERSAL WASTE DISPOSAL FACILITY AUDIT PROTOCOL**

**ENERGY, ENVIRONMENT, SAFETY & HEALTH**

**(EESH)**

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# Non-Hazardous and Universal Waste Disposal Facility Audit Protocol Process

#### Introduction

Lockheed Martin Corporation is striving to eliminate adverse environmental impact from its operations. The Corporation has taken steps to reduce its carbon impact, invest in renewable energy and is implementing a strategy to reduce waste sent to landfills, and reduce wastewater water discharges. Hazardous wastes/materials are managed under national contracts that have been negotiated with favorable pricing and indemnification terms and conditions. The overarching document governing waste disposal in Lockheed Martin is [EESH Functional Procedure ESH-06](http://lmcmc.global.lmco.com/lmcmc/jsp/home.jsp).

Non-hazardous waste treatment, storage, recycling, and disposal facilities generally are not regulated to the same extent as their hazardous waste counterparts, thus, Lockheed Martin requires an audit to be conducted for all non-hazardous waste sites. This document outlines the Lockheed Martin non-hazardous waste facility audit protocol. Universal waste facilities are included and shall follow this protocol.

#### Goals and Objectives

The goal of the this audit program is to limit the potential liability associated with the use of waste disposal facilities as identified in [EESH Functional Procedure ESH-06](http://lmcmc.global.lmco.com/lmcmc/jsp/home.jsp). The audit program objectives are:

1. Establish an audit protocol and reporting format for use by ESH professionals in the business units;
2. Audit non-hazardous and universal waste recycling/disposal facilities by using the protocol. The completed audit shall be approved by Corporate EESH prior to use. Audit approval is valid for a maximum of three years.

#### Scope

All facilities that accept Lockheed Martin waste (hazardous, non-hazardous, and universal) for recycling, treatment, or disposal, shall be audited. This document identifies the audit protocol for non-hazardous and universal waste facilities. Exemptions are identified in ESH-06.

#### Roles and Responsibilities

Business units are responsible for completing audits in accordance with this document and providing results of audits to Corporate EESH.

A LM ESH professional or independent contractor qualified by training and experience shall conduct the audit

EESH posts the [approved non-hazardous waste disposal facility](http://eshweb.beth.lmco.com/cesh/LFRAMES.asp?CategoryID=49&ParentCategory=10&DocID=0&PDocID=0) list on ESHWeb.

#### Approach and Methodology

Audits consist of a three part process:

* 1. An initial telephone survey is conducted, per attachment A, to screen facilities for a potential on-site facility review. Topics include waste handling, training, safety, spills, compliance, and finances ;
  2. If required – a site visit, per attachment B, provides additional information on facility design, maintenance and operation, financial assurance, regulatory performance, and management systems;
  3. A written report, per attachment C, is prepared which summarizes both the telephone survey and facility visit if conducted.

Attachment A - Part I: Telephone Screening – Disposal Facility Review

The telephone questionnaire involves interviews with the disposal site's representatives. The questionnaire covers a number of topics crucial to deciding if the disposal facility meets the LM requirements. If the facility passes all sections of the telephone survey with an “Acceptable” rating – no site visit is required. If the facility scores “Marginal” a facility visit shall be necessary. If the facility fails the telephone screen an alternate facility shall be sought. Corporate EESH shall receive the results document to prevent the same facility from being audited by another Lockheed Martin facility.

Attachment A - Part II: Telephone Screening -- Regulatory Sources Review

After completion of the facility review the Lockheed Martin auditor shall conduct an environmental regulatory agency review and an OSHA regulatory review. If a regulator contradicts the facility’s answers, an alternate facility shall be sought. If the most recent regulator visit date is more than 2 years old – a site visit is required.

Attachment A - Part III: Site Visit Decision

This page is the combined summary data for the telephone screening completed by the facility and the regulators.

Attachment B: The site visit questionnaire covers the same topics as the phone interview. If the site visit is required, based on the results of the telephone survey, the site visit questionnaire is designed to confirm or contradict the phone interview results.

Attachment C: A written report shall be prepared, regardless of the result, and submitted to the Corporate EESH mailbox, [**ESH Admin - Governance**](mailto:eshweb.admin.fc-lmss@lmco.com?subject=Waste%20Disposal%20Facility%20Audit). Attachment C contains the audit report letter and the audit summary data. Upon review of the audit report, corporate EESH shall determine approval or disapproval and publish the result on ESHWeb.

#### Cost of the audit

The cost of auditing individual disposal facilities shall be absorbed by the Lockheed Martin facility (or facilities) conducting the audit. If a thorough third party audit is desired it can be purchased through the LM third party audit provider, if available, for about $1000. Please contact corporate EESH to request this audit by emailing [**ESH Admin** **- Governance**](mailto:eshweb.admin.fc-lmss@lmco.com?subject=Waste%20Disposal%20Facility%20Audit).

**Process Steps**

Non-hazardous waste facility identified by a LM business entity for possible use.

**Step 1**- Check ESHWeb to see if the waste facility has already been audited by another LM facility.

↓

No - Go to step 2

Yes - If facility has already been approved; waste may be shipped to facility.

If facility has been rejected, seek alternate facility.

↓

**Step 2**-Telephone survey to facility and local regulators

↓

Acceptable – Submit telephone survey to EESH for review

Marginal – Go to Step 3

Fail-Vendor cannot be used (Provide EESH with telephone survey questionnaire)

↓

**Step 3**-Site visit

↓

Passed - Go to step 4

Fail-Vendor cannot be used (Provide EESH with site visit questionnaire)

↓

**Step 4**-Submit completed audit report to the EESH, [**ESH Admin - Governance**](mailto:eshweb.admin.fc-lmss@lmco.com?subject=Waste%20Disposal%20Facility%20Audit)

↓

**Step 5**-EESH reviews audit report and dispositions (approve/reject)

↓

Approved – EESH notifies LM entity and posts approved facility and report on ESHWeb

Reject – EESH notifies LM entity and provides alternative options

**E-mail Completed Audit documents to the** [**ESH Admin - Governance**](mailto:eshweb.admin.fc-lmss@lmco.com?subject=Waste%20Disposal%20Facility%20Audit) **mailbox [eshweb.admin.fc-lmss@lmco.com]**

# Attachment A - Telephone Screen Questionnaire

This questionnaire is to be used as a screening tool for non-hazardous and universal waste recycling, treatment, storage and disposal facilities considered for use by Lockheed Martin Corporation. It is the first of a multi-part audit process to assess the viability of using these facilities. The purpose is to collect general information regarding a facility to determine if the second part of the process, a site visit, should be conducted.

The telephone questionnaire consists of several topics, including interviews with the relevant environmental regulatory agencies. Compare the agency interviews to site representative responses for validation. Please be as concise as possible in responding to the questions. Summary opinions of the auditor should be based on responses provided to topic questions. You may go beyond this core set of questions or probe more deeply if you feel that is warranted. If a facility fails any part of the screening process or provides suspicious answers, an alternate facility should be sought. Upon failure, please submit the questionnaire to corporate EESH.

|  |  |
| --- | --- |
| Facility Name: |  |
| Owning Company: |  |
| Parent Company: |  |
| Physical Address: |  |
| Mailing Address: |  |
| Primary Contact: (name, phone, email) |  |
| Secondary Contact: (name, phone, email) |  |
| Site ID Numbers for Environmental Permits: | |
| EPA ID: |  |
| State ID: |  |
| Other: |  |
| Other: |  |

## Telephone Audit Questions for Disposal Facility

### Waste Handling Operations

1. Does the facility maintain a written waste analysis plan (or similar document, such as a waste/material acceptance plan, sampling plan, etc)?
2. What documents are used to validate incoming wastes/materials (i.e., RCRA manifest, bill of lading, recordkeeping, and reporting)?
3. Does the facility confirm that the waste sent to the site is the expected and/or permitted material, i.e., do they have adequate waste acceptance criteria and follow them?
   1. How do they do this, and how are rejected loads handled?
   2. What percentage of incoming wastes/materials are checked and/or analyzed?
4. Does the facility have a method to track when and where the waste is processed/ disposed?
5. Does the facility provide any type of “certificate of destruction” service?
6. How long is waste typically stored before being disposed?
7. What incoming waste streams are disposed onsite and what waste streams are shipped to other facilities for disposal?
   1. What are the names and locations of those facilities?

If the LM waste being shipped to this facility will ultimately be disposed at a downstream facility, then you shall audit the downstream facility.

1. At what percentage of the allowed treatment or storage capacity is the facility operating?
   1. If a land disposal facility, how many years of operational lifetime remain?
2. What happens to each type of recovered material, process residual, or waste stream generated by the facility (e.g. hazardous, non-hazardous, wastewater, liquid waste streams, empty drums, other)?
   1. Does the facility properly manage all of the waste it receives?
   2. Are the materials or their treatment and disposal residues being sent to the appropriate kinds of outside facilities?
   3. Has this facility recently audited those outside facilities?
   4. Does the facility maintain required documentation and permits related to the handling of residual waste streams?
3. What are the recycling and/or treatment processes?

**Auditor Assessment:**

##### Is waste handled properly?

Facility has waste management plan implemented; disposes of waste within permitted time limit; has sufficient capacity; treatment/disposal is completed on site for all or close to all materials received; treatment process is appropriate for waste type – Acceptable

Facility is doing things generally well, but several of the items discussed were out of line from expectations – Marginal

Facility is accepting waste it is unable to process; inability to track waste destinations; slow waste processing rate; management of its waste not in accordance with regulation, its permits, its written plans, or good practices - Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Facility Personnel & Training

1. Is there a formal training program?
   1. Are training records kept for each employee?
2. Are there employees who specialize in Environment, Safety, and Health (ESH) management?
   1. What is their background in ESH?
   2. How many ESH personnel support this facility - onsite / offsite?
3. What training is given to employees and managers with respect to their jobs and ESH hazard risk reduction, and compliance?
4. How does site management ensure compliance and conduct waste management operations?
   1. What risks do they acknowledge exist, and how do they manage them?

**Auditor Assessment:**

**Are employees properly trained?**

A training program is in place; proper training has been provided to all employees; training records are kept; employees with the appropriate ESH knowledge are in place; waste management risks have been addressed - Acceptable

Facility is doing things generally well, but several of the items discussed were out of line from expectations - Marginal

Lack of understanding of the OSHA training requirements; ESH employee issues, and/or permit site risks; a reluctance or inability to answer all key questions – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Employee Health & Safety

1. Does the facility have a written health & safety plan?
   1. What are some of the key elements?
2. Have there been any fatalities or serious injuries at the site in the last five years?
3. What kinds of injuries are most common?
4. Review the OSHA 300 injuries and illnesses log for the last 3 years and fill in the following table.

|  |  |  |  |
| --- | --- | --- | --- |
| Year | Total Hours Worked | Number of Cases Involving Days Away From Work\* | DACR = 200,000 x Cases / Total Hours Worked |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

\* Generally, the sum of columns 3 and 10 of the OSHA 300 log for a year

##### Auditor Assessment:

##### Is the health & safety program adequate?

A safety program is in place; proper training has been provided to all employees; training records are kept; no serious injuries or fatalities, excellent DACR numbers - Acceptable

Lack of a written, relevant employee health and safety plan; a missing or erroneous Facility is doing things generally well, but several of the items discussed were out of line from expectations - Marginal

OSHA 300 log; a day away case rate greater than 10 – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Site Contamination

1. Has an ASTM E-1527 or similar environmental Phase I or II assessment of the property been conducted?
   1. By whom was the assessment conducted (preferably by an independent, qualified contractor)?
   2. What were the results?
2. How is stormwater handled on site (i.e. run-on and run-off)?
   1. Is there a stormwater management plan?
   2. If stormwater is treated, describe the process.
3. Does the site have engineering controls to prevent contaminant migration to groundwater?
   1. Does the facility have a liner beneath landfill cells?
   2. Does the facility have leak detection or leachate collection systems?
4. Has groundwater and/or soil sampling ever been conducted?
   1. Has contamination been found?
   2. Describe any contamination that has been identified at the facility, including groundwater, surface water, and soils, in terms of contaminant types and maximum concentrations vs. state/province standards.
5. If applicable, describe any remedial actions taken or planned to address site contamination.
6. What type of storage tanks are onsite (i.e. UST, AST) and how many are there?

##### Auditor Assessment:

**Is the site contaminated?**

Site has no contamination or low risk for contamination – Acceptable

Site is currently undergoing remediation for contaminated areas – Marginal

Site is contaminated with no remediation or has a risk of uninvestigated contaminated areas – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Facility Condition including Fires/Explosions/Spills/Releases

1. Describe any fires, explosions, or reportable spills or releases occurring within the past 4 years.
2. What was the cause of each incident?
3. What corrective measures have been taken to address these incidents?
4. Have there been any repeated incident types (e.g., a fire in the same unit on more than one occasion during the past 4 years)?
5. If applicable, is a Spill Prevention Control and Countermeasures (SPCC) plan in place throughout the facility?
6. What level of fire and spill prevention exists (e.g. nitrogen blanketing of flammable storage tanks, impervious secondary containment of waste storage areas, overfill alarms and interlocks on tanks, fire detection and extinguishing systems, fencing or similar security)?
7. Is there a containment system for spills, leaks, and precipitation?
8. Is most of the processing and material handling equipment in good condition?
9. Is there a preventive maintenance program in place? What equipment is included?

##### Auditor Assessment:

**Were there any Fires, Explosions, Spills, or Releases?**

Site had no fires, explosions, spills, or releases during the last 4 years; SPCC plan in place if applicable; containment system in place – Acceptable

Site had a fire, explosion, spill, or release during the last 4 years and corrective actions are in place to prevent recurrence; limited spill containment – Marginal

Site had repeated fires, explosions, spills, or releases; no preventive maintenance program; no spill containment program – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### General Compliance

1. Is there a formal management system (i.e. ISO 9000, ISO 14000)?
2. Have there been any public complaints against the facility in the past five years?
   1. If yes, how many and what was topic?
3. With regard to environmental permits, what are the key compliance requirements that can be checked during the facility tour?
4. If the facility has no environmental permits, how are they exempted from permitting requirements?
   1. What regulations apply?
   2. Are facility personnel able to explain the exemptions in a way that shows they understand the regulatory climate?
5. Are the records well-organized, usable, and up-to-date?

##### Auditor Assessment:

**Is the facility in compliance?**

Proper permits and systems are in place and no public complaints in 5 years – Acceptable

Permits exist but no management system – may have minor public complaints – Marginal

No permits or systems in place and have public complaints – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Regulatory Issues & Enforcement Actions History

1. List the agencies (i.e., those having jurisdiction over this site with respect to water discharges, air emissions, waste storage/disposal, and chemical storage), and associated inspectors, their phone numbers, and the ID numbers or names by which this facility is registered with them, and follow up with them, using the questions in Part II; if none, then contact the local fire department.

|  |  |  |  |
| --- | --- | --- | --- |
|  | | | |
| Agency | Contact Name | Phone | E-mail |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
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|  |  |  |  |

1. Describe any environmentally-related inspections and consequent alleged violations, citations and/or fines received by the facility in the last two years:
   1. List and describe all deficiencies or non-compliances:

| **Inspection Date** | **Agency** | **Violations Noted or Fines Imposed** | **Issues Settled?** |
| --- | --- | --- | --- |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

* 1. List and describe all Notices of Violation (NOV):

| **Inspection Date** | **Agency** | **Violations Noted or Fines Imposed** | **Issues Settled?** |
| --- | --- | --- | --- |
|  |  |  |  |
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* 1. What corrective measures have been taken to avoid repeat violations?

1. Has the facility previously entered into a consent order or other agreement with any agency in response to alleged violations? If yes, describe.
2. Has there been any significant, environmentally-related litigation against the site or the site operator in the last five years? Litigation refers to legal action taken by non-government organizations or private citizens.

##### Auditor Assessment:

**Are regulatory issues under control?**

No NOVs, all deficiencies corrected in a timely manner, no litigation – Acceptable

NOVs resolved in a timely manner, no litigation, open enforcement items – Marginal

Recurring NOVs or recent litigation – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Finances and Insurance

1. Review last year’s independently audited financial statement or balance sheet for the site's owner. If you do not understand the following terms or how to read them from a balance sheet, consult with your facility’s procurement or financial department staff.
2. Calculate the following ratios:

Current Ratio = Current Assets ¸Current Liabilities = \_\_\_\_\_\_\_\_\_\_\_

A Current Ratio greater than 1 indicates that the facility would likely have funds to address corrective action; 0.5 - 1 is marginally acceptable; but less than 0.5 indicates a problem: potentially insufficient cash flow in event of a financial emergency.

Debt-to-Equity Ratio = Total Liabilities ¸ Total Assets = \_\_\_\_\_\_\_\_\_\_\_

A Debt-to-Equity Ratio less than 0.5 indicates that the facility is only slightly leveraged and has a low financial risk. A ratio less than 1 is acceptable; but more than one indicates a problem: potentially overly-leveraged business.

1. If the facility will not provide recent a recent audited financial statement, have a Dun and Bradstreet Co. check done on it (this can be done by the LM procurement representative), and determine if there are any substantial problems reported by its creditors.
2. Does the facility have environmental impairment or third party environmental damages liability insurance?
   1. If so, ask for a copy of the certificate.
3. Does the facility have a closure fund?
   1. Describe it (guarantor, funding level and basis):

##### Auditor Assessment:

**Is the financial strength of the company adequate?**

Financial statements provided – ratios look good – insurances in place – Acceptable

Would not provide statement information on phone but agreed to share in person, or Dun and Bradstreet report obtained with acceptable ratios – Marginal

Would not provide statement information and could not find financial data elsewhere, or financial data showed ratios well outside the desired limits – Not Acceptable

Warning signs include unwillingness to disclose any financial data (audited or not), even in the face of an offer of a confidentiality agreement, or the data indicates financial distress, or is suspect or inconsistent with other observations.

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Environmental Information

1. Does the facility have formal sustainability program?
   1. What does it include?
2. Does the facility have a formal plan to manage and reduce greenhouse gas emissions?
   1. What is implementation timeframe?
3. Does the site have written environmental procedures?
   1. What assurance is there that they are followed?

## Telephone Screening -- Regulatory Sources Review

Contact the environmental agencies identified in the facility telephone audit and verify if it has jurisdiction over this site's operations. If so, talk to the inspector assigned to this site, or to someone who can discuss or send the recent inspection records. Note that some states may post this type of information on-line and may defer the site investigation to electronically available queries.

**Multiple Inspectors from multiple agencies are desired.**

**Complete one interview page per regulator.**

**Regulatory Agency:**

**Regulatory Name:**

1. When were the last environmental inspections of this facility?
   1. What were the inspection subjects?
   2. What were the inspection(s) results?
   3. Were any enforcement actions (notice of violation, shutdown order, etc.) taken against the facility?
   4. Are there any open enforcement actions, litigation or citizen complaints against the facility?
2. Is the site contaminated to the point where ongoing monitoring or remediation is, or may be, required?
3. Have any fires, explosions, fatalities or other major releases occurred at the site over the past 4 years?
   1. What happened?
   2. What was done to correct the problem?
4. Are regulatory issues under control?
5. Is the facility in compliance?
6. Record the inspector's impressions of the facility in terms of compliance, management/housekeeping, community and regulatory relations, and other relevant factors.
7. Ask the regulator any question from the telephone audit that needed confirmation from an outside source. Record those questions and answers here:

## Site Visit Decision

**Fill in the following items to summarize the phone interviews with the disposal facility (Part I) and the responsible regulators (Part II).**

**No site visit is required** if all 9 sections are deemed *Acceptable* or if there is only 1 *Marginal*.

**A site visit is required** if there are 1 or 2 *Not Acceptable* responses or 2-4 *Marginal* responses.

**An alternate facility** should be identified if there are 3 or more *Not Acceptable* responses or 5 or more *Marginal* responses.

###### Is waste handled properly?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Are employees properly trained?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Is the health & safety program adequate?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Is the site contaminated?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Were there any Fires, Explosions, Spills, or Releases?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Is the facility in compliance?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Are regulatory issues under control?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Is the financial strength of the company adequate?

**Acceptable**  **Marginal**  **Not Acceptable**

|  |  |  |
| --- | --- | --- |
| **# Acceptable:** | **# Marginal:** | **# Not Acceptable:** |
| *Comments:* | *Comments:* | *Comments:* |

Other Observations (positive or negative):

## Site Visit Preparation

The goal of the site visit is to confirm the *Acceptable* sections from the phone interview and either validate or enter the appropriate rating for the *Not Acceptable* and *Marginal* responses.

During the site visit it will be necessary to look at documentation and observe employees. A tour of the entire facility is expected to determine physical condition and general housekeeping.

**In setting up the visit, determine the following prior to getting to the facility:**

1. What personal protective equipment (PPE) (e.g., hard hat, safety glasses, steel-toed shoes) are auditors required to bring to the site?

1. What personal protective equipment (PPE) will be supplied by the site?
2. Are photographs of the site permitted?
3. With what restrictions, if any?
4. Other site visit requirements, restrictions or recommendations (e.g., boots for mud)?
5. Directions to the site and approximate driving times from the Lockheed Martin facility or nearest transportation center:
6. For the visit, the site should have the following items ready:

* Last two years of OSHA 200/300 logs
* Environmental operations and employee safety and health procedures
* Training documents
* Regulatory file, including permits, registrations, notices of exemption, results of regulatory inspections, and enforcement actions taken over the last two years
* Financial statements and environmental insurance policy (if not already sent) -- offer to sign a confidentiality agreement (with facility legal department review before signing) if that will help in disclosure.

# Attachment B - Site Visit Questionnaire

This questionnaire is to be used to guide a site visit of a universal waste or non-hazardous treatment, storage, and disposal facility (disposer). It is the second of a multi-part process all Lockheed Martin business units must follow to assess the viability of using a non-hazardous or universal waste facility for disposal of company owned/ generated wastes. The purpose is to collect specific information regarding facility operations and management systems to determine if the facility should be used by Lockheed Martin business units.

The questionnaire consists of nine topics. Most require written responses to specific questions and a summary opinion of the reviewer. Be as concise as possible in responding to the questions; however, you may want to write your notes on a separate sheet of paper keyed to this set of questions. Summary opinions of the auditor should be based on responses provided to topic questions.

## Site Visit -- General Observations

1. Take multiple pictures as allowed of the general site, surrounding area, processing areas, receiving area, potential problem areas, etc. Attach the photos (in a compressed format with 2-4 pictures and captions per page) to the end of this attachment.
2. Facility location - Describe the surrounding area (populated, residential, commercial, industrial, rural, remote, etc.):
3. Are there any sensitive locations within approximately one-half mile of the site (e.g., schools, hospital, residences)?
   1. If so, pay particular attention to catastrophe release prevention systems at the site.
4. Are any of the neighboring sites contaminated to the point of requiring remediation (based on site representative or regulator information)?
   1. If so, determine if the site has to take measures to avoid contamination.
5. What is the general facility appearance?
   1. Housekeeping - General upkeep, maintenance, or condition of key equipment (e.g., condition of paint, insulation, pump seals, rusty equipment, inspection tags, etc.):
   2. Is there any ponded water around the facility?
   3. Are there any visible signs of emissions or leaks (sheens on water)?
   4. What is the condition of any storage tanks?
6. For what was the site historically used?
   1. Should it be investigated for legacy contamination?

##### Auditor Notes:

## Site Visit Questions

### Waste Handling Operations

1. Look at the written waste analysis plan (or similar document, such as a waste/material acceptance plan, sampling plan, etc).
2. Look at documents used for incoming wastes/materials (i.e., RCRA manifest, bill of lading, recordkeeping, and reporting).
3. During your walk around, were any non-permitted wastes seen?
4. Is there evidence of storage of substantial amounts of waste for excessively long periods (e.g., more than twelve months)?
5. Look at any recent audits of outside facilities that accept residual waste from this facility.
6. Look at required documentation and permits related to the handling of the residual waste streams.

**Auditor Assessment: (Includes Telephone, Regulator, and Site Visit)**

##### Is waste handled properly?

Facility has waste management plan implemented; disposes of waste within permitted time limit; has sufficient capacity; treatment/disposal is completed on site for all or close to all materials received; treatment process is appropriate for waste type – Acceptable

Facility is doing things generally well, but several of the items discussed were out of line from expectations - Marginal

Site is accepting waste it is unable to process; inability to track waste destinations; slow waste processing rate; management of its waste not in accordance with regulation, its permits, its written plans, or good practices - Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Facility Personnel & Training

1. Look at formal training program documentation.
2. Look at documented risks for compliance and waste management.

**Auditor Assessment: (Includes Telephone, Regulator, and Site Visit)**

##### Are employees properly trained?

A training program is in place; proper training has been provided to all employees; training records are kept; employees with the appropriate ESH knowledge are in place; waste management risks have been addressed - Acceptable

Facility is doing things generally well, but several of the items discussed were out of line from expectations - Marginal

Lack of understanding of the OSHA training requirements; ESH employee issues, and/or permit site risks; a reluctance or inability to answer all key questions – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Employee Health & Safety

1. Look at written health & safety plan.
   1. During your site tour, verify that the site’s employees appear to follow the plan?
   2. If there is no plan, are activities conducted in a safe manner (e.g., wearing required PPE)?
2. Were site personnel observed to be properly wearing the appropriate personal protective equipment (PPE) during the site inspection?
3. Look at the OSHA 300 injuries and illnesses log for the last three years and confirm they match the information provided in the phone interview.

**Auditor Assessment: (Includes Telephone, Regulator, and Site Visit)**

##### Is the health & safety program adequate?

A safety program is in place; proper training has been provided to all employees; training records are kept; no serious injuries or fatalities, excellent DACR numbers - Acceptable

Facility is doing things generally well, but several of the items discussed were out of line from expectations - Marginal

Lack of a written, relevant employee health and safety plan; a missing or erroneous OSHA 300 log; a day away case rate greater than 10 – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Site Contamination

1. Look at the ASTM E-1527 or similar environmental Phase I or II assessment of the property.
2. Look at stormwater collection and treatment system.

**Auditor Assessment: (Includes Telephone, Regulator, and Site Visit)**

**Is the site contaminated?**

Site has no contamination or low risk for contamination – Acceptable

Site has contamination in remediation or has high risk for contamination – Marginal

Site is contaminated with no remediation – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Facility Condition including Fires/Explosions/Spills/Releases

1. Look at documentation of any incidents and the associated corrective measures taken to address these incidents.
2. Housekeeping: does the facility appear neat and organized?
   1. Are hazardous substances and wastes neatly stored and not in direct contact with soil or water?
3. When performing a walk-around of the facility, note any pits, ponds, lagoons, or other units that have the potential to result in contamination or uncontrolled hazardous substance releases, fires or explosions.
4. During facility tour determine, if applicable, if the Spill Prevention Control and Countermeasures (SPCC) plan is in place throughout the facility.
5. Look at containment system for spills, leaks, and precipitation.
6. Does most of the processing and material handling equipment appear to be in good condition? What is not?
7. Does the preventive maintenance program look to be in place?
   1. What equipment is included?

**Auditor Assessment: (Includes Telephone, Regulator, and Site Visit)**

**Are the facility and prevention mechanisms in good working order?**

Site had no fires, explosions, spills, or releases during the last 4 years; SPCC plan in place if applicable; containment system in place; emergency response and prevention equipment in place – Acceptable

Site had a fire, explosion, spill, or release during the last 4 years and corrective actions are in place to prevent recurrence; limited spill containment – Marginal

Site had repeated fires, explosions, spills, or releases; no preventive maintenance program; no spill containment program; obvious signs of leaks and large soil stains – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### General Compliance

1. Look at any documented public complaints against the facility in the past five years.
2. Verify that the records well-organized, usable, and up-to-date.

**Auditor Assessment: (Includes Telephone, Regulator, and Site Visit)**

**Is the facility in compliance?**

Proper permits and systems are in place and no public complaints in 5 years – Acceptable

Permits exist but no management system – may have minor public complaints – Marginal

No permits or systems in place and have public complaints – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Regulatory Issues & Enforcement Actions History

1. Verify corrective measures have been taken to avoid repeat violations of previously noted enforcement actions.

**Auditor Assessment: (Includes Telephone, Regulator, and Site Visit)**

**Are regulatory issues under control?**

No NOVs, all deficiencies corrected in a timely manner, no litigation – Acceptable

NOVs resolved in a timely manner, open enforcement items, no litigation – Marginal

Recurring NOVs or recent litigation – Not Acceptable

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Finances and Insurance

1. If the financial strength assessment from the telephone-screening portion was not provided until now, fill out that section.
   1. Summarize results below

Current Ratio = Current Assets ¸Current Liabilities = \_\_\_\_\_\_\_\_\_\_\_

Debt-to-Equity Ratio = Total Liabilities ¸ Total Assets = \_\_\_\_\_\_\_\_\_\_\_

General Financial Strength Comments:

**Auditor Assessment: (Includes Telephone, Regulator, and Site Visit)**

**Is the financial strength of the company adequate?**

Financial statements provided – ratios look good – insurances in place – Acceptable

Financial statements provided – ratios are barely outside ranges – Marginal

Would not provide statement information and could not find financial data elsewhere, or financial data showed ratios well outside the desired limits – Not Acceptable

Warning signs include unwillingness to disclose any financial data (audited or not), even in the face of an offer of a confidentiality agreement, or the data indicates financial distress, or is suspect or inconsistent with other observations.

**Acceptable**  **Marginal**  **Not Acceptable**

##### Auditor Notes:

### Environmental Information

1. Look at the formal sustainability program documentation. Is it comprehensive?
2. Look at formal greenhouse gas emissions reduction plan. Is it comprehensive?
3. Look at the written environmental procedures. Are the employees following them?

## Summary of All Findings (Telephone, Regulatory, Site Visit)

**Fill in the following items to summarize the cumulative set of answers to the phone interviews with the disposal facility and the responsible regulators (Attachment A), plus the site visit interviews and observations (Attachment B).**

**A site can clearly be recommended for use for up to 3 years** if all 9 sections are deemed *Acceptable* or if there is only 1 *Marginal* and 8 *Acceptable*.

**A site can probably be recommended for use for up to 18 months** if there are 1 or 2 *Not Acceptable* responses or 2-4 *Marginal* responses.

**An alternate facility** should be identified if there are 3 or more *Not Acceptable* responses or 5 or more *Marginal* responses.

###### Is waste handled properly?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Are employees properly trained?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Is the health & safety program adequate?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Is the site contaminated?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Were there any Fires, Explosions, Spills, or Releases?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Is the facility in compliance?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Are regulatory issues under control?

**Acceptable**  **Marginal**  **Not Acceptable**

###### Is the financial strength of the company adequate?

**Acceptable**  **Marginal**  **Not Acceptable**

|  |  |  |
| --- | --- | --- |
| **# Acceptable:** | **# Marginal:** | **# Not Acceptable:** |
| *Comments:* | *Comments:* | *Comments:* |

Other Observations (positive or negative):

# Attachment C - Audit Report

|  |  |
| --- | --- |
| LM Facility requesting audit: |  |
| LM Facility Contact Name: |  |
| LM Business Area / Business Unit: |  |
| Auditor’s Name / Company: |  |
| Auditor phone and e-mail address: |  |
| Date of Telephone Audit: |  |
| Date of Site Visit Audit: |  |

|  |  |
| --- | --- |
| Is this a new / additional disposal facility or a re-audit of existing? |  |
| Is this facility intended to replace a previously approved facility? | [If yes – which facility?] |
| What is the distance from the LM facility to the disposal facility? |  |
| What are the planned volumes and materials to be sent to this facility? |  |
| Are there any other LM sites that could use this facility if approved? |  |

**Audit Report Letter**

# 

of performed an audit of the facility in .

This facility accepts the following materials:

This facility processes the materials using the following kinds of technology:

The site was {visited on DATE} {not visited because it was deemed *Acceptable* / *Not Acceptable* by the telephone audit}. The completed site visit details (Attachment B) and / or completed telephone interview details (Attachment A) are included in this report.

My summary of the capability of this facility is:

This disposal facility is RECOMMENDED FOR APPROVAL until {DATE} / DISAPPROVED for use.

Signature:

Date:

# 